

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

RENEWED UNOPPOSED MOTION TO FILE UNDER SEAL

Plaintiff States (“States”) respectfully move the Court for leave to file under seal Exhibits A, A-3, and D (including Exhibit 1 to Exhibit A) (the “Confidential Exhibits”) to their Opening Brief to the Special Master for the March 7, 2024 Hearing. These Confidential Exhibits were previously filed under seal on February 27, 2024 (ECF No. 269). This renewed motion is being filed pursuant to the Court’s subsequent order denying without prejudice the States’ prior motion (ECF No. 268) to seal these Confidential Exhibits (ECF No. 282). Defendant Google LLC (“Google”) does not oppose the States’ sealing request.

The States, with Google’s consent, request to file under seal the Confidential Exhibits because, according to Google:

Exhibits A, A-3, and D: Google requests that these exhibits remain under seal as they reveal individual employee names and contact information. Google intends to propose publicly available versions of these documents be filed with limited redactions only to protect individual personnel information.

Consistent with Local Rule CV-5, the States will work with Google to file redacted versions—with as limited redactions as possible—of the Confidential Exhibits within seven (7) days.

Google has further advised the States that Exhibits A-2 and A-4, although previously filed under seal, need not be sealed and may be filed publicly. The States will thus publicly file those.

For the reasons stated above, the States respectfully request that this Court allow the States to file the Confidential Exhibits under seal.

Dated: March 15, 2024.

Respectfully submitted,

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Submitted on behalf of all Plaintiff States

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CERTIFICATION OF CONFERENCE

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/ Geraldine Young
Geraldine Young

CERTIFICATE OF SERVICE

I certify that on March 12, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Geraldine Young
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